EXHIBIT A

DECLARATION OF VINCE CARNEVALE
IN SUPPORT OF PLAINTIFFS' BRIEF

Before me the undersigned authority personally appeared Vince Carnevale, who being duly sworn by me deposed and said the following:

1. My name is Vince Carnevale. I am over the age of 21 and fully competent to make this declaration. I am an Attorney/Analyst with Crivella West Incorporated, 712 Washington Road, Pittsburgh PA 15228. I have been employed with Crivella West for seven (7) years. Crivella West is a technology firm that specializes in, among other things, the processing, handling, and advanced searching of substantial document productions in major litigations. I have personal knowledge of the statements contained in this declaration, which is being submitted in support of Plaintiffs' Brief. All statements in the declaration are true and represent the state of the document production as of January 16, 2014.

2. Ethicon, Inc. has produced 1,975,512 documents / 12,256,963 pages. (This includes documents produced up to and including Production Letter date 1/10/2014, as well as all Hernia Mesh Documents).

3. A comprehensive search was done to identify duplicate documents for the nine (9) production numbers listed below:

   1. ETH.MESH.04081189
   2. ETH.MESH.05479535
   3. ETH.MESH.04081301
   4. ETH.MESH.08505291
   5. ETH.MESH.03738466
   6. ETH.MESH.00585802
   7. ETH.MESH.03932909
   8. ETH.MESH.03932912
   9. ETH.MESH.10632680

4. The results of these searches are listed in the table below. There were no duplicate files found for five (5) of the documents. There were duplicates found for one (1) document and partial duplicates found for the remaining four (4) documents. Partial duplicates were discovered embedded in produced email chains. All of these duplicates/partial duplicates were produced under the same source names as the original files.

Table 1

Production Number	Source	Results - Duplicate Production Number and Source Name
ETH.MESH.04081189	Chen, Meng	No duplicates found
ETH.MESH.05479535	Batke, Boris	No duplicates found
ETH.MESH.04081301	Chen, Meng	No duplicates found
ETH.MESH.08505291	Cecchini, Peter	2 duplicates found - see ETH.MESH.08505071 (Cecchini, Peter); ETH.MESH.08505229 (Cecchini, Peter)
ETH.MESH.03738466	Weisberg, Martin	No complete duplicate found, however 3 duplicates of embedded email chain found - see ETH.MESH.03715880 (Weisberg, Martin); ETH.MESH.03715878 (Weisberg, Martin); ETH.MESH.03715860 (Weisberg, Martin)
ETH.MESH.00585802	Kammerer, Gene	No complete duplicate found, however 1 duplicate of embedded email chain found - see ETH.MESH.01219629 (Kammerer, Gene)
ETH.MESH.03932909	Arnauld, Axel	No duplicates found
ETH.MESH.03932912	Arnauld, Axel	No duplicates found
ETH.MESH.10632680	Smith, Dan	No complete duplicate found, however 4 duplicates of embedded email chain found - see ETH.MESH.10632686 (Smith, Dan); ETH.MESH.10632684 (Smith, Dan); ETH.MESH.10632681 (Smith, Dan); ETH.MESH.10632688 (Smith, Dan)

5. The De-duplication logs[i] produced to date by Ethicon, Inc. were searched to find all entries related to these (9) documents. There is no indication from this data that duplicate files from other custodians were duped out and not produced. The data produced in the deduplication logs appear in the table below.

Table 2

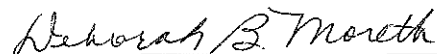| Custodian	Source	ProdBeg	ProdEnd	MD5Hash	ProdVol	MSGID
NULL	Chen, Meng	ETH.MESH.04081189	ETH.MESH.04081190	A094D3A9533181DFFE59513C672C196F	Production 54	NULL
NULL	Batke, Boris	ETH.MESH.05479535	ETH.MESH.05479535	NULL	Production 78	985d6ed5-cfdc-4bf4-b847-5a280490041d
NULL	Chen, Meng	ETH.MESH.04081301	ETH.MESH.04081302	15DD80A6F67D536B138E62A5FAD51F8A	Production 54	NULL
NULL	Cecchini, Peter	ETH.MESH.08505291	ETH.MESH.08505291	NULL	Production 129	13648191
NULL	Weisberg, Martin	ETH.MESH.03738466	ETH.MESH.03738467	2F8191F1DF6F9F20DE4D5F0D786044DB	Production 39	
NULL	Kammerer, Gene	ETH.MESH.00585802	ETH.MESH.00585802	09036A9697FC4DEE791CD2641E099F23	Production14	
NULL	Arnaud, Axel	ETH.MESH.03932909	ETH.MESH.03932911	E058C7704936570131BC28D18974E9BF	Production 48	
NULL	Arnaud, Axel	ETH.MESH.03932912	ETH.MESH.03932914	0F424D3EEBE50A860678D22230C063AB	Production 48	
NULL	Smith, Dan	ETH.MESH.10632680	ETH.MESH.10632680	NULL	Production 187	

Further, affiant sayeth naught.

Dated this /7ᵗʰ day of January, 2014.
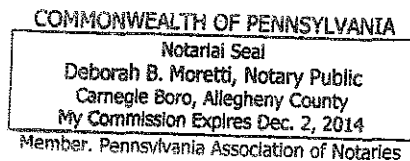
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VINCE CARNEVALE

STATE OF PENNSYLVANIA   )
)
COUNTY OF ALLEGHENY   )

Subscribed and sworn to before me by Vince Carnevale, on this /7ᵗʰ day of January, 2014.

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Notary Public In and For the State of
Pennsylvania

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Deborah B. Moretti, Notary Public
Carnegie Boro, Allegheny County
My Commission Expires Dec. 2, 2014
Member. Pennsylvania Association of Notaries

My commission expires: 12-02-2014

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[i] See IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION MDL No. 2327- Case 2:12-md-02327 Document 235 Filed 08/30/12 - **PTO #13 (Stipulation for the Production of Documents and Electronically Stored Information)** - *Section III. C. De-duplication*

C. De-duplication. Removal of duplicate documents shall only be done on exact duplicate documents (based on MD5 or SHA-1 hash values at the document level) and may be done across custodians and sources. Near-duplicate documents shall be produced rather than removed. The custodian associated with the first copy of a document processed will be considered the "pivot" custodian for that document (the custodian who will be used as the basis for determining which other collected documents are duplicates). After each production, the producing party shall produce an "other sources" listing of all other custodians or sources who or which possessed each duplicate document. In addition, after each production, the producing party will produce a de-duplication log that contains the Bates number of the produced version of each de-duplicated document (for lookup purposes), and the de-duplicated custodian or source.

SUMMARY OF THE DOCUMENTS

To show the Court that these are not nine randomly selected documents, but rather are nine important documents, Plaintiffs are providing the following summary:

1) **Meng Chen, Meeting Agenda, ETH.MESH.04081189**: This document discusses adverse reactions associated with the TVT products, discusses patient complaints about the products, and questions whether product warnings should be updated.

2) **Boris Batke, Chart, ETH.MESH.05479535**: This chart shows how Ethicon categorized various mesh products based on pore sizes.

3) **Meng Chen, Work in Progress Weekly, ETH.MESH.04081301**: This document discusses adverse events and patient complaints, and raises the issue that the adverse events are not in the warnings for TVT-A, TVT-O, or TVT-S.

4) **Peter Cecchini e-mail, ETH.MESH.08505291**: This message expresses concern about a proposed new package insert for the TVT, which would warn that patients who have had prior surgical procedures "may require special consideration due to scar tissue."

5) **Martin Weisberg e-mail, ETH.MESH.03738466**: This message expresses concern that some physicians may not be adequately trained to implant the TVT device and addresses whether Johnson & Johnson has a responsibility to make sure that they are.

6) **Gene Kammerer e-mail, ETH.MESH.00585802**: This message discusses testing in France showing that the TVT suffered 8.5% particle loss—an indication of degradation.

7) **Axel Arnaud, History of the TVT-O, ETH.MESH.03932909**: This history includes the statement that newer procedures were "obviously safer than the retropubic approach (TVT)." Mr. Arnaud then found someone to modify the existing transobturator approaches, to give the appearance that Ethicon was "an innovative company."

8) **Axel Arnaud, The History of TVT, ETH.MESH.03932912**: This history indicates that the long-term efficiency of the TVT "was not substantiated by clinical results." Further, "it was broadly admitted that the use of any mesh through the vaginal route was associated with a high rate of complications, such as rejection/infection and urethral erosion." The history further explains how Dr. Arnaud brought the TVT to market.

9) **Dan Smith e-mail, ETH.MESH.10632680**: This e-mail questions whether a procedure done by Secant is ensuring that the mesh is sufficiently "interlocked."

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CONFIDENTIAL DOCUMENT